



Your business  
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 19, 2015

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Moundville Telephone Company, Inc.  
Study Area Code 250307**

Dear Ms. Dortch:

On behalf of Moundville Telephone Company, Inc. ("Moundville"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup> Moundville seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

---

<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



Your business  
is our business.

**REDACTED – FOR PUBLIC INSPECTION**

7852 Walker Drive, Suite 200  
Greenbelt, Maryland 20770  
phone: 301-459-7590, fax: 301-577-5575  
internet: [www.jsitel.com](http://www.jsitel.com), e-mail: [jsi@jsitel.com](mailto:jsi@jsitel.com)

June 19, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Moundville Telephone Company, Inc.  
Study Area Code 250307  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Moundville Telephone Company, Inc. (“Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”) which is contained in the attachment to the 2015 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

---

<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> 47 C.F.R. §§ 54.313(a)(1).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

---

<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

 FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name: Person USAC should contact with questions about this data	Scott Taylor
<035>	Contact Telephone Number: Number of the person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	scott@mound.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 0	<input type="checkbox"/>	<input type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 6	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330>	Detail on Attempts (broadband) 250307a1330.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440>	Fixed 2.11	<input type="checkbox"/>	<input type="checkbox"/>
<450>	Mobile 0.0	<input type="checkbox"/>	<input type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	250307a1510.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	250307a1610.pdf (attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000>	Voice Services Rate Comparability Certification Yes	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100>	Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/> (if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--	--

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<div> <input type="radio"/> (yes / no)                 </div> <div> <input checked="" type="radio"/> (yes / no)                 </div>
<111>		<div> <input type="radio"/> (yes / no)                 </div> <div> <input type="radio"/> (yes / no)                 </div>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

1/1/2015
16.3

1/1/2015	
16.3	

-- See attached worksheet



FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

[illegible]

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

[illegible]

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

<910>	Tribal Land(s) on which ETC Serves
-------	------------------------------------

<920>	Tribal Government Engagement Obligation
-------	---

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

<b>(1100) No Terrestrial Backhaul Reporting</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Collection Form</b>		July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

<b>(2000) Price Cap Carrier Additional Documentation</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	ROUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Layton
<035>	Contact Telephone Number - Number of person identified in data line <030>	2055719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@round.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information	

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}


**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

- <2016> Certification Support Used to Build Broadband

--

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification


<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

	Name of Attached Document(s) Listing Required Information
--	---

- <2021> Interim Progress Community Anchor Institutions

REDACTED FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	MOONVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@moonv.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)

Progress Report on 5 Year Plan

Milestone Certification (47 CFR § 54.313(f)(1)(ii))

250307a13010.pdf

Name of Attached Document Listing Required Information

(3011)

Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☒

(3012)

Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

250307a13012.pdf

Name of Attached Document Listing Required Information

(3013)

Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

☒

(3014)

If yes, does your company file the RUS annual report

☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)

Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017)

If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

250307a13017.pdf

Name of Attached Document Listing Required Information

(3018)

If the response is no on line 3014, Is your company audited?

☒

(3019)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

☐

(3019)

Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021)

Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

☐

(3021)

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

☐

(3022)

Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

(3023)

Underlying information subjected to a review by an independent certified public accountant

☐

(3024)

Underlying information subjected to an officer certification.

☐

(3025)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3026)

Attach the worksheet listing required information

Name of Attached Document Listing Required Information

REDACTED FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation (Continued)

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	



<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer: ext.	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	250307
<015> Study Area Name	MOUNDVILLE TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035> Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	MOUNDVILLE TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/18/2015
Printed name of Authorized Officer:	Scott Taylor
Title or position of Authorized Officer:	Pres
Telephone number of Authorized Officer:	2053719011 ext.
Study Area Code of Reporting Carrier:	250307 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	MOUNDVILLE TEL CO
Name of Authorized Agent or Employee of Agent:	Wes Robinson
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/18/2015
Printed name of Authorized Agent or Employee of Agent:	Wes Robinson
Title or position of Authorized Agent or Employee of Agent	Manager - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	5123380473 ext.
Study Area Code of Reporting Carrier:	250307 Filing Due Date for this form: 07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

## 2014 Unfulfilled Requests

REF	MASKED CUSTOMER NAME	DESCRIPTION OF SERVICE REQUESTED	SERVICE REQUESTED (✓ ALL APPLICABLE TO UNFULFILLED REQUEST)		BROADBAND REQUESTED	DESCRIBE HOW CARRIER ATTEMPTED TO PROVIDE SERVICE
			BROADBAND	VOICE		
1		1 High Speed Internet Access	x		any	no options currently available
2		2 High Speed Internet Access	x		any	no options currently available
3		3 High Speed Internet Access	x		any	no options currently available
4		4 High Speed Internet Access	x		any	no options currently available
5		5 High Speed Internet Access	x		any	no options currently available
6		6 High Speed Internet Access	x		any	no options currently available
7						
8						
9						

47 CFR §54.313 (a)(3)

**Moundville Telephone Company**

**Study Area Code: 250307**

**Response to Line 510 - Service Quality Standards and Consumer Protection Rules**

**Compliance – Voice and Broadband**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Moundville Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Alabama Public Service Commission’s Rules and Regulations, Telephone Rules, Rule T-12, Filing of Telephone Tariffs and The Code of Alabama 1975 Section 37-1-81, which disclose rates, terms

---

<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which require adherence to minimum service standards as identified in the Alabama Public Service Commission's Rules and Regulations, Telephone Rules, Rule T-21, protection against cramming and other deceptive practices as identified in Rule T-16(C)(11); (3) truth-in-billing requirements as identified in Rule T-16; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

**Moundville Telephone Company**

**Study Area Code: 250307**

**Response to Line 610 - Ability to Function in Emergency Situations for Voice and  
Broadband**

Moundville Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)<sup>1</sup> and the applicable Alabama Public Service Commission Rules and Regulations, Telephone Rules. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company’s central office(s) that have twenty-four (24) hour maintenance coverage or have an automatic start engine alternator can provide a minimum of three (3) hours of batter reserve in accordance with the Alabama Public Service Commission Rules and Regulations, Telephone Rules, Rule T-21(L)(2). All other central office(s), as and if applicable, have a minimum of eight (8) hours of battery reserve In accordance

---

<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”



with Rule T-21(L)(2).The Company's standby generators and battery back-up equipment support both voice and broadband network equipment in the event of an emergency situation.

The MTC central office is equipped with a natural gas generator that will power all voice and broadband equipment as well as being equipped with recently-replaced battery back-ups to maintain power during a transition from commercial to back-up power and for a minimum of eight (8) hours should the fuel supply be interrupted. All remote equipment locations have batteries to maintain them for a minimum of eight (8) hours. Portable generators are also available for extended periods of commercial power interruptions.

The Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

1/1/2015
16.3

<701>	Residential Local Service Charge Effective Date
<702>	Single State-wide Residential Local Service Charge

<703>

[illegible]

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

[illegible]

**Moundville Telephone Company****Study Area Code: 250307****Rates, Terms and Conditions for Lifeline Service****(Response to Form 481, Line 1210)**

Local exchange service rates and charges as specified below are for basic local exchange service. The rates for other ancillary services not specifically shown below are presented in Moundville Telephone Company's tariff(s) on file with the Alabama Public Service Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates:<sup>1 2</sup>

<b>Exchange Name</b>	<b>R-1 Rate</b>
Moundville	\$16.30

---

<sup>1</sup> Above listed fees do not include mandatory taxes, fees and surcharges.

<sup>2</sup> Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

## **Low Income Assistance Program**

Qualifying residents can receive help in paying for their telephone services under an assistance program (for residential customers only) being offered by Moundville Telephone Company. The program is called Lifeline Assistance (Lifeline). Moundville Telephone Company participates in this assistance program in order to increase the availability of telecommunications services to all consumers in its serving area. Qualifying terms and conditions apply.

### **Lifeline**

Lifeline reduces an eligible customer's monthly rates for local service. An eligible customer receives credit for the Federal Subscriber Line Charge (SLC) and the Alabama Transition Service Fund (TSF).

### **Credit**

The following credit\* will apply for each eligible customer:

- |  |         |
|--|---------|
| 1. Federal Subscriber Line Charge (SLC)  | \$ 9.25 |
| 2. Alabama Transition Service Fund (TSF) | \$ 3.50 |

\*Monthly credit amount will not exceed the total of the SLC and Residential Local Exchange Rate.

If you have any questions regarding this program, please call **205.371.9011**, or visit our business office at **371 Corr Ave., Moundville, AL 35474**.

## S2. BASIC LOCAL EXCHANGE SERVICE

S2.14 Low-Income Assistance Programs

Low-Income Assistance Programs consist of two programs, Lifeline Assistance and Lifeline Connection Assistance (Link-Up). These programs were developed to reduce rates for low income customers. The Company participates in both of these assistance programs to increase the availability of telecommunications services to all consumers in its serving areas. The structure of each program is outlined in the following paragraphs.

A. Lifeline Assistance

## 1. General

Lifeline Assistance reduces an eligible customer's monthly rates for local service. An eligible customer receives credit for the Federal Subscriber Line Charge as well as a credit towards the residential access line rate.

## 2. Regulations

- a. Lifeline Assistance is available to all residential customers who participate in Medicaid.
- b. All applications for this service are subject to verifications with the state agency responsible for administration of the qualifying program.
- c. The Company will reconcile and confirm eligibility periodically with the responsible agency. Upon a determination of ineligibility, the credit will be discontinued on the bill following written notification to the customer.
- d. The Company will process all applications and apply the appropriate credit on the customer's monthly bill. A secondary service charge is not applicable for existing customers who subscribe to Lifeline Assistance.

ALL MATERIAL ON THIS SHEET IS NEW.

## S2. BASIC LOCAL EXCHANGE SERVICE

S2.14 Low-Income Assistance Programs (Continued)A. Lifeline Assistance (Continued)2. Regulations (Continued)

- e. As a participant in Lifeline Assistance, customers are eligible to receive Toll Limitation Service at no charge. This service will only be provided at the customer's request.
- f. Local service deposit requirements will be waived for customers who voluntarily receive Toll Limitation Service.
- g. Participants in Lifeline Assistance shall not be disconnected from Local Service for non-payment of toll charges. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for non-payment of toll charges. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.
- h. Partial payments that are received from Lifeline customers will first be applied to local service charges and then to any outstanding toll charges.
- i. Customers eligible under Lifeline are also eligible for connection assistance under the Link-Up program.
- j. One low income credit is available per household and is applicable to the primary residential connection only.
- k. A Lifeline customer may subscribe to any local service offering available to other residential customers.
- l. The PIC charge will not be billed to Lifeline customers who subscribe to toll blocking and do not presubscribe to a long distance carrier.

ALL MATERIAL ON THIS SHEET IS NEW.

Issue Date: 12/22/97  
Issued By: Larry P. Taylor  
Title: President

Effective Date: 1/1/98  
Docket No.:

---

S2. BASIC LOCAL EXCHANGE SERVICES2.14 Low-Income Assistance Programs (Continued)A. Lifeline Assistance (Continued)

## 3. Credits

The following credits\* will apply for each customer eligible for Lifeline Assistance:

	<u>Monthly Credit*</u>
a. Federal Subscriber Line Charge Credit	\$ 3.50
b. Initial Federal Credit to Residential Access Line	1.75
c. State Credit to Residential Access Line	3.50
d. Additional Federal Credit to Residential Access Line	1.75
Total Credit Amount	\$10.50

\* Credit amount will not exceed the total of the Subscriber Line Charge and the Residential Local Exchange rate.

ALL MATERIAL ON THIS SHEET IS NEW.

---

Issue Date: 12/22/97  
Issued By: Larry P. Taylor  
Title: President

---

Effective Date: 1/1/98  
Docket No.:



**Moundville Telephone Company**

**Study Area Code: 250307**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Moundville Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

**Moundville Telephone Company, Inc. (SAC 250307)**

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly  
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Moundville Telephone Company hereby provides the FCC with a list of community anchor institutions to which it newly began providing access to broadband service in calendar year 2014.<sup>1</sup>

<b>Number</b>	<b>Name</b>	<b>Address</b>
1	Moundville Public Library	279 Market Street, Moundville, Alabama

---

<sup>1</sup> The FCC has defined community anchor institutions in Section 54.5 of its Rules as “schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities.”

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**